

# **EXHIBIT**

**23**

THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

Civil Action No. 1:14-CV-00954-LCB-JLW

STUDENTS FOR FAIR ADMISSIONS,  
INC.,

Plaintiff,

v.

UNIVERSITY OF NORTH CAROLINA,  
et al.,

Defendants,

and

LUIS ACOSTA; ANDREW BRENNAN,  
CHRISTOPHER JACKSON on behalf of  
C.J.; RAMONIA JONES on behalf of R.J.;  
JULIA NIEVES on behalf of I.N.; ANGIE &  
KEVIN MILLS on behalf of Q.M.; LAURA  
ORNELAS; CECILIA POLANCO;  
TAMIKA WILLIAMS on behalf of A.J.;  
and STAR WINGATE-BEY

Defendant-Intervenors.

**DECLARATION OF  
PAMELA PHIFER WHITE**

Pamela Phifer White, pursuant to 28 U.S.C. § 1746, declares the following:

1. My name is Pamela Phifer White. I am over 18 years of age, and I am fully competent to make this declaration.
2. I was a full-time undergraduate student at UNC-Chapel Hill during the period of 1981-1985. While at UNC, my major was Radio, Television and Motion Pictures (RTVMP).
3. I am African-American.

4. My father received a college degree from a four year college. My mother did not.

5. Several factors weighed into my decision to attend UNC-Chapel Hill. Although I was aware of the universities' status as a school of excellence and high achievement, it was secondary to the pride I felt in having 3 uncles who previously attend. Representing their perspective classes of '63, '68 and '72, my uncles were deep sources of inspiration as they shared stories of courage and determination to stay and graduate from Carolina during a very ugly of race relations in North Carolina and the United States.

6. Community! Community is the word that quickly comes to mind when I recall my matriculation at UNC-Chapel Hill, especially within the class ranks of other African-American (blacks) students. In addition, I felt our cultural and social organizations were fairly supported by the school's administration (i.e., space accommodations, courses of the African-American Studies). While there were still many demands for improvements, we were the rich benefactors of the many struggles and protests preceding our enrollment, which indeed paved the way for the tight-knit community I enjoyed in the early/mid 80's.

7. I cannot go very many places and not enjoy the benefits of being a UNC-Chapel Hill graduate. Having had such a great experience is only further enhanced by the number of relationships maintained with other black alumni and the afforded opportunities as a result.

8. Although I never felt personally singled out as the total sum cry of the black voice or experience on campus, I would say I was still uniquely aware of the negative stereotypes in UNC-Chapel Hill's majority white environment. Doing my best to avoid such negative stereotypes, I still had to dealt with the occasional existence of covert racism, racial bias and labels. As an incoming freshman, I was only 17 years removed from the landmark Civil Rights Act of 1964, and I recognized (as I believed most of my black peers do too) my role as a legacy

student charged with carrying the torch forward for the black alumni trailblazers who broke through tough racial barriers for my sake. There were indeed opportunities to feel isolated, but the close community of Black UNC (BSM, Opeyo Dance Troupe, Greeks) provided a safe haven for me.

9. There was no way around being, or sometimes feeling, underrepresented at UNC-CH as a student of color in any classroom setting or major/area of study. Black students in the mid-80s made up about 8% of the undergraduate and graduate enrollment (about 1, 400 out of 23,000). I was therefore, always remotely aware of being one of a handful (if not the only) black students in most of my classes. Coming from an integrated high school I was used to this status, especially in advanced courses. Therefore, the scenarios that Carolinas' demographic presented were as stressful for me as for other of my black classmates.

10. As previously expressed my overall experiences as a UNC student and UNC black student on and off campus were pretty good. I had white roommates (freshmen through junior year) and those relationships were very positive. Occasionally I encountered rudeness or "exclusions-unaware." Such encounters I generally ignored, but there was one incident that jarred me significantly, and I recall it vividly to this day. The spring of my junior year, while stepping off the curb at a cross-walk on Franklin Street, a carpool of four (4) white guys in a light blue convertible hurled the word "Nigger!" at me as they sped by. I was stunned and rendered immobile for what felt like 10 minutes. I had never been called that word, and the drunken vitriol with which they said it hurt in the worst way. I remember later calling a friend to share the encounter but there were no words to describe it, only despairing tears.

11. During spring semester of 1983, I participated in campus protest and marches to recruit more women and black faculty (<http://newspapers.digitalnc.org/lccn/2015236558/> 1983-

03-17/ed-1/seq-5/# ). In my remaining senior year, I saw a slight increase in minority faculty as well as course offerings in African American Studies, but not enough. I also had the good fortune of being at Carolina during the tenure of dynamic faculty members like the late Dean Hayden B. Renwick (Associate Dean of College of A/S) and the late Dr. Sonja Stone (AFAM Department). Dean Renwick, a very hands-on administrator, was very instrumental in helping black (and minority) students navigate through EVERYTHING with the school's administration, including social issues, racial issues and school policy inadequacies. A force to be reckoned with, he was a problem solver, and for many of us a "bridge over troubled waters." Through the launch of his minority counseling programs, Dean Renwick mentored thousands of black students to become likewise; critical thinkers and problem solvers.

12. I am proud to say that I have a daughter who is a rising Junior at UNC-Chapel Hill. Although she has experienced academic success and is involved in many campus activities (Carolina Kick-off freshman camp Counselor, Black Student Movement, UNC Cheer team), she has often complained that there is not a sense of unity or black community as she has heard described for so many years. This was quite sad to hear and from listening to her and some of her black peers, I believe one of the contributing factors is access to space/facilities, and the funding for such. When I was at Carolina, we had a designated space called the Upendo Lounge and full access to Great Hall in the Student Union for most of our social events. In reviewing recent timelines of +/- gains, it appears that facility access became MORE restrictive rather than accommodating. Students should not have to drive off-campus to venues for social functions (especially with the number of student fees included in my daughter's tuition!). It is, however, my understanding that this past year the Upendo Lounge was remodeled and re-designed for black students' use. Unfortunately, it was not without pushback from many white students

(threads can be found in some of the campus student blogs). UNC-Chapel Hill can do better and should do better.

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I declare under penalty of perjury that the foregoing is true and correct. Executed  
this 16<sup>th</sup> day of June, 2017.

Pamela C. White